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VIA ECF

October 7, 2019

Hon. Anne Y. Shields
Magistrate Judge, United States District Court
Eastern District of New York
100 Federal Plaza
P.O. Box 830
Central Islip, NY 11722

Re: Unique Importer & Distributor, Inc. v. Sterling Seafood Corp. et al.
United States District Court, Eastern District of New York
Docket Number: 2:19-cv-03883-JMA-AYS
Our File No. 1.1.614 and 1.1.615

Representing defendants: Smart Chef Supply, Inc.
Palli Trading Inc.
Zoya USA, Inc.
Special Appearance by: Cherians International Fresh Market, LLC
Golden Ocean Seafood, Inc.
MGM Geeth Foods Inc.
National Imports LLC
P&P Asian Foods, Inc.
Tampa Grocery, Inc.
TT Asian Grocery, Inc.

Dear Judge Shields:

This firm represents Smart Chef Supply, Inc., Palli Trading Inc. and Zoya USA, Inc., and by special appearance represents Cherians International Fresh Market, LLC, Golden Ocean Seafood, Inc., MGM Geeth Foods Inc., National Imports LLC, P&P Asian Foods, Inc., Tampa Grocery, Inc., TT Asian Grocery, Inc., collectively referred to hereinafter as the “Defendants”.

Pursuant to Your Honor's rules, we request on behalf of all the aforementioned Defendants, reserving all rights and without waiving the right to contests personal jurisdiction (those defendants who appear by special appearance contest personal jurisdiction as none of those defendants are

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Letter to Court 2019-10-07.wpd

domiciled in New York or do business within the State of New York or conduct business with people within New York), that the Court extend the Defendants' time to respond to co-defendant Sterling Seafood Corp.'s cross-claims (by answer, motion or otherwise) from October 10, 2019 to November 9, 2019. This extension has been consented to by co-defendant Sterling Seafood Corp.'s counsel.

This is the Defendants' first request for such adjournment in so far as it applies to the recently asserted cross-claims, and to our knowledge, the requested adjournment does not affect any other scheduled dates.

We would respectfully request that Court extend the Defendants' time to respond to the complaint to November 9, 2019.

Sincerely,

BERENTHAL & ASSOCIATES, P.C.

by: 
DAVID W. BERENTHAL, ESQ.

DWB:abm